FACTS ABOUT REDUCING FORMALDEHYDE EMISSIONS FROM

Composite Wood Products

Airborne Toxic Control Measure (ATCM) Requirements for Fabricators

What are composite wood products?

"Composite wood products" are wood-based panels made from pieces, chips, particles, or fibers bonded together with a resin. Composite wood is found in hunderds of everyday applications, ranging from plywood, oriented strand board (OSB), and structural members used in new home construction, to cabinets, doors, and furniture. However, the Composite Wood ATCM specifically focuses on three products: hardwood plywood (HWPW), particleboard (PB), and medium density fiberboard (MDF). Most of HWPW, PB, and MDF is used to make finished goods, such as furniture, cabinets, shelving, countertops, flooring, and molding.



The ATCM, approved by the Air Resources Board (ARB) in April 2007, applies to panel manufacturers, third party certifiers, distributors, importers, fabricators, and retailers of HWPW, PB, MDF, and finished goods containing those products, sold or delivered to California

What is the definition of a fabricator?

The ATCM defines "fabricator" as anyone that uses composite wood products to make finished goods. Examples of fabricators include individuals and/or companies that use composite wood panels to produce furniture, cabinets, doors, etc. Those entities that manufacture HWPW, PB, or MDF panels are also considered "manufacturers" under the ATCM.

What are the requirements in the approved control measure?

The ATCM establishes two phases of formaldehyde emission standards, for HWPW with a veneer core (HWPW-VC) and with a composite core (HWPW-CC), PB, MDF, and thin MDF (<8 mm thick). Complying materials must be used in finished goods made with those materials. The standards apply to domestic and imported products.

PHASE 1 EMISSION STANDARDS (in parts per million - based on ASTM E 1333-96)								
EFFECTIVE DATE	HWPW-VC	HWPW-CC	PB	MDF	tMDF			
JANUARY 2009	0.08		0.18	0.21	0.21			
JULY 2009		0.08						

PHASE 2 EMISSION STANDARDS								
EFFECTIVE DATE	HWPW-VC	HWPW-CC	PB	MDF	tMDF			
JANUARY 2010	0.05							
JANUARY 2011			0.09	0.11				
JANUARY 2012					0.13			
JULY 2012		0.05						

What is meant by "Reasonable Prudent Precaution"?

The ATCM requires that fabricators take reasonable prudent precautions to ensure that the composite wood products they procure for producing finished goods comply with applicable emission standards. This means that fabricators must employ supply chain management by asking for compliant products from their suppliers, and by receiving written verification that they were supplied with compliant materials.

Fabricators may also ask their composite wood product mill suppliers to identify their third party certifier and ask for copies of the mill's formaldehyde testing results to verify compliance with the formaldehyde emissions standards.

What are the labeling and statement of compliance requirements for fabricators?

Fabricators must label all finished goods produced for the California market to indicate they are made with complying products. The label shall be applied as a stamp, tag, sticker, or bar code on



every finished good produced, or on every box containing finished goods. The minimum label requirements are: the fabricator's name, production date, and markings that the product was made with HWPW, PB, and MDF that complies with applicable emission standards. Fabricators are also required to designate the use of no-added formaldehyde based resins (NAF) or ultra-low emitting formaldehyde based resins (ULEF) if this is so for all of the HWPW, PB, and MDF used in fabricating a given finished good. Fabricators must also include a statement of compliance on bills of lading or invoices, which serves as a record of the sale of compliant products for downstream customers.

What are the recordkeeping requirements for fabricators?

All fabricators producing goods for the California market must keep records showing the dates of purchase and suppliers of composite wood products that they used, and to whom they sold their finished goods. These records must be kept in either electronic or hard copy form for a minimum of two years.

Are fabricators subject to facility inspections?

Yes. All fabricators are subject to inspection by ARB inspectors whether they are located in California or not. California fabricators are also subject to inspection by local air district personnel. During inspections, ARB or local air district personnel may audit records and to secure samples for compliance testing.

What exemptions apply under the ATCM?

The ATCM does not apply to finished goods sold outside of California or to products subject to federal requirements governing the construction of manufactured homes. Exemptions have also been provided for: window assemblies that contain less than 5 percent by volume of HWPW, PB, and MDF combined in relation to the total volume of the finished window products; exterior doors and garage doors that contain less than 3 percent by volume of HWPW, PB, and MDF, or if they are made from composite wood products manufactured with no-added formaldehyde based resins (NAF) or ultra-low emitting formaldehyde (ULEF) resins. Finished goods made in California by local government agencies and school districts that are not offered for sale in the state are also exempt from recordkeeping or product labeling requirements.

How does the ATCM address existing inventories produced prior to the implementation dates?

A sell-through provision has been included to allow for a reasonable clearing of inventories following the effective dates of the Phase 1 and Phase 2 standards. For fabricators, an 18 month sell-through period is provided, during which it would be legal to sell finished goods that were made from composite wood products that were manufactured prior to the Phase 1 or Phase 2 effective dates. After the sell-through period, finished goods containing HWPW, PB, or MDF, must be made with composite wood products that comply with applicable standards.

Are fabricators required to emission test their finished product?

Typically, fabricators are only required to take precautions to ensure that the composite wood products that they obtain for use comply with the applicable emission standards. However, in the case where fabricator also manufactures composite wood products for use in their finished goods, then the raw boards must be tested and certified to meet the applicable emission standards before use in making finished goods for California.

What are fabricator requirements for laminated products?

A laminated product is a finished good or component part of a finished good made by a fabricator in which a laminate or laminates are affixed to a platform. The platform can be either a composite wood product or a core material used in the manufacture of hardwood plywood. If the platform consists of a composite wood product, then it must comply with the applicable emission standards, and be third party certified.

FOR MORE INFORMATION

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